

Exhibit A

*Excerpts of Sen. Ralph Hise
Deposition*

1 be removed.

2 We ultimately decided -- don't know that the
3 decision is at this level, as that doesn't match the
4 final. The final decision was that we picked the
5 precincts that in the presidential race had performed
6 least well for Republicans and removed them from -- or
7 most well, depending on which side of that aisle
8 you're on -- and removed them from New Hanover County.

9 Q. So the precincts that were the most heavily
10 Democratic, you moved them over so SD8?

11 A. Specifically the precincts that had voted
12 least heavily for Donald Trump.

13 Q. Was Donald Trump the candidate of choice for
14 Black voters?

15 MR. STRACH: Objection.

16 THE WITNESS: We've been through this a
17 couple of times. I think to the concept of saying did
18 the majority of Black voters vote for Donald Trump,
19 I think the answer is clearly no.

20 BY MS. HARRIS KLEIN:

21 Q. So I see a black number and a red number in
22 that area. Can you tell me what those are?

23 A. The black number -- I am almost positive that
24 that is a deviation from normal percentages. So we're
25 looking to say is it between minus 5 or plus 5 for

1 that district; so does it meet the equal population
2 requirements.

3 The red number is an election result, and
4 I will make a general assumption that it is
5 presidential performance.

6 Q. Other than the political consideration, were
7 there any other criteria -- so other than the
8 equalizing population and the political that you've
9 mentioned, were there any other criteria that can
10 explain that little notch that goes into New Hanover
11 County?

12 A. There are no other considerations that we
13 made.

14 Q. Let's look at Mecklenburg County.

15 A. Yes.

16 Q. Do you recall where the idea for Mecklenburg
17 County came from? I guess it's the
18 Mecklenburg/Iredell --

19 A. It is. Pod.

20 Q. -- pod.

21 Do you recall where the idea came for that
22 idea?

23 A. Similar to what I've said before. Iredell is
24 actually fairly close to being a full district. Has a
25 very narrow region at the top where it contains to

1 keeping one of the non-Charlotte municipalities whole
2 and getting a better political percentage, which
3 one --

4 A. If it were towards keeping a full -- not
5 dividing a municipality, not dividing a VTD, we would
6 try to get the political -- historic political
7 performance as high as we could on the races we
8 selected without violating -- without splitting a VTD
9 or a municipal boundary.

10 Q. Did you work with anybody who's familiar with
11 the Mecklenburg area when you drafted this part of the
12 senate map?

13 A. Senator Newton would be the chair that is
14 closest to the Mecklenburg area. Has the part of
15 "Sweet Union," as he says, that is part of that. But
16 he does not reside in Mecklenburg County.

17 Q. Without telling me any communications that
18 he's told to you, what is your general understanding
19 of his familiarity with the area?

20 A. As residing in a neighboring county, not as a
21 legislator who interacts with their elected officials
22 or runs for office within the county.

23 Q. Let's go to the next exhibit. This will be
24 marked Exhibit 44.

25 (Exhibit No. 44 was marked for identification.)